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THE CITY OF NEW YORK
LAW DEPARTMENT
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August 23, 2023

BY ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted. **SO ORDERED.**

New York, New York
August 24, 2023

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

Re: Ryan Paige v. City of New York, et al.
21 Civ. 11104 (JGK)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Kevin Major, Gregg Albaum, Jonathan Santos, and Edward Reyes (“City defendants”) in the above-referenced matter. The plaintiff and City defendants write jointly to respectfully request to adjourn the August 25, 2023 deadline for the parties to submit a Rule 26(f) report until after the pending motions to dismiss have been fully resolved. Defendants FedEx Ground Package System, Inc. and Juan Valerio consent to this request. This is the first such request and does not affect any other Court deadlines.

By way of background, on August 4, 2023, defendants FedEx Ground Package System, Inc. and Valerio separately filed motions to dismiss plaintiff’s Amended Complaint, with plaintiff’s response due August 25, 2023. See ECF No. 38, First Motion to Dismiss by FedEx Ground Package System, Inc., August 4, 2023; ECF No. 39, First Motion to Dismiss by Juan Valerio, August 25, 2023. The City defendants filed their Answer to plaintiff’s Amended Complaint that same day. See ECF No. 37, Answer, August 4, 2023. Therefore, with the motions to dismiss pending, the plaintiff and City defendants respectfully request to file their Rule 26(f) report after the motions to dismiss have been fully resolved.

Accordingly, the plaintiff and City defendants write jointly to respectfully request to adjourn the August 25, 2023 deadline for the parties to submit a Rule 26(f) report until after the motions to dismiss have been fully resolved.

The City defendants and plaintiff thank the Court for its consideration.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino

Senior Counsel

Special Federal Litigation Division

Cc: **By ECF:**
All Attorneys of Record